

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

SHERYL SATTERTHWAITE AS
EXECUTRIX OF THE ESTATE OF
DENNIS SATTERTHWAITE

Plaintiff,

No. 05-10606 REK

vs.

UNITED STATES OF AMERICA, UHS OF
WESTWOOD PEMBROKE, INC., ARTHUR
N. PAPAS, M.D. AND CATHERINE
SULLIVAN, R.N.C.

Defendants.

JOINT STATEMENT

Plaintiff and defendants in the above action suggest the following proposed
pretrial schedule:

1. Initial disclosures served by February 7, 2006;
2. The plaintiff and the defendants, UHS of Westwood Pembroke, Arthur Papas, M.D. and Catherine Sullivan, R.N.C. propose that the deadline for serving interrogatories and document requests be March 7, 2006. The defendant, U.S.A., proposes that the deadline be August 7, 2006;
3. The plaintiff and the defendants, UHS of Westwood Pembroke, Arthur Papas, M.D. and Catherine Sullivan, R.N.C. propose that the deadline for service of responses to all written discovery requests be within the time provided by Fed. R. Civ. P. 33, 34 and 37 or in no event later than May 7, 2006. The defendant, U.S.A., proposes that the deadline be October 7, 2006;
4. Amendments/additional joinder to pleadings filed by August 26, 2006;
5. Completion of non-expert depositions and other factual discovery (medical examinations, site inspections) by January 7, 2007. The plaintiff and the defendants, U.S.A. and Arthur Papas, M.D. propose that the plaintiff be limited to 15 depositions and the defendants be limited to 10 depositions. The defendants, UHS of Westwood Pembroke and Catherine Sullivan, R.N.C. propose that both the plaintiff and defendants be limited to 15

depositions. The parties propose that the limitations on the number of depositions will not apply to any Keeper of Records depositions;

6. Plaintiff's disclosure of information regarding experts pursuant to FRCP 26(b)(4)(A)(i) by February 30, 2007; Defendants' within thirty (30) days thereafter;
7. If agreed to by all parties, parties shall either (a) participate in outside mediation, or (b) request Senior Judge mediation by March 30, 2007;
8. All expert depositions and discovery completed by May 30, 2007;
9. Serving of dispositive motions by July 30, 2007, with oppositions served within 21 days; and
10. Pre-trial conference or hearing on motions for summary judgment by August 30, 2007.

In addition, the parties have conferred with a view toward settlement and controlling the costs of litigation. Alternative dispute resolution programs, or trial by a magistrate judge are under consideration, but not yet agreed to by the parties pending further discovery and discussions.

The parties note that a medical malpractice tribunal in Norfolk Superior Court for the defendant, Arthur Papas, M.D., is currently scheduled for February 14, 2006.

The parties hereby certify that the above information is complete and accurate.

PLAINTIFF

Cheryl Satterthwaite

By her Attorneys

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DEFENDANTS

Universal Health Services, Inc. and
Catherine Sullivan, R.N.C.

By their Attorneys

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DEFENDANT

United States of America

By its Attorneys

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DEFENDANT

Arthur Papas, M.D.

By his Attorneys

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